

FILED IN MY OFFICE  
DISTRICT COURT CLERK  
3/18/2014 3:20:24 PM  
ERIC ELLIS

STATE OF NEW MEXICO  
COUNTY OF EDDY  
FIFTH JUDICIAL DISTRICT COURT

MAT

MICHAEL WALDROP,  
Plaintiff,

vs.

CV-2014-159

Schlumberger Technology  
Corporation, a foreign profit  
Corporation, M-I SWACO (a.k.a.  
M-I LLC), a foreign Limited  
Liability Company, and  
LEONEL LUJAN,  
Defendants.

FIRST AMENDED COMPLAINT FOR RETALIATORY DISCHARGE IN VIOLATION OF THE  
NEW MEXICO WAGE AND HOUR ACT AND FAIR LABOR STANDARDS ACT, AND FOR PRIMA  
FACIE TORT AND BREACH OF IMPLIED CONTRACT

COMES NOW, Michael Walrop, the Plaintiff, by and through his attorneys, the Martin, Dugan and Martin Law Firm, and for his *First Amended Complaint For Retaliatory Discharge In Violation Of The New Mexico Wage And Hour Act and the Fair Labor Standards Act, and for Prima Facie Tort and Breach of Implied Contract* states:

1. Plaintiff, Michael Waldrop, is a resident of Roswell, Chaves County, New Mexico.
2. The Defendant, Schlumberger Technology Corporation, is a foreign corporation whose registered agent for process is National Registered Agent's Inc, located at 123 East Marcy, Santa Fe, New Mexico 87501.
3. M-I Swaco is known as M-I, LLC. It is a foreign limited liability company. Schlumberger owns this company and manages it. Its registered agent for process is National Registered Agent's Inc, located at 123 East Marcy, Santa Fe, New Mexico 87501.

EXHIBIT

4. Leonel Lujan is an employee of Schlumberger/M-I Swaco. He was Plaintiff's supervisor.
5. The Plaintiff and the Defendants all work and do business in Eddy County, New Mexico. The facts giving rise to this Complaint also occurred in Eddy County, New Mexico. Venue is proper in the Fifth Judicial District Court of Eddy County.
6. Plaintiff worked for the Defendant Schlumberger/M-I Swaco at a rig located in an isolated portion South Eddy County. For over two years he had been paid "drive time" for the time it took him to drive from his home to the rig. Likewise, other employees were also paid drive time for the time it took them to drive from their home to the rig.
7. Plaintiff worked approximately sixteen (16) hour days. Approximately twelve (12) of those hours were spent on site at the rig. The remaining four (4) were spent driving between the rig and his home.
8. The Defendant Schlumberger/M-I Swaco provided Plaintiff with a company truck for his drive.
9. In or around January 2013 the Defendant Schlumberger/M-I Swaco delivered overnight trailers to the rig site. These trailers had sleeping quarters. The Plaintiff was told about the trailers and that he could stay in trailers rather than drive home. Plaintiff was not told he would be paid to stay in the trailers, and believed he would not be compensated for staying overnight at a remote rig site.
10. The Plaintiff elected not to stay overnight in trailers. Between January 2013 and December 9, 2013, he continued to drive between the rig and his home. He also

continued to collect drive time during this period without any objection from his employer or directive not to include the drive time.

11. The Plaintiff's coworkers and employees of Defendant continued to collect drive time and were not staying at the rig site.

12. On December 9, 2013, an employee by the name "Chapa" contacted Plaintiff and requested he stop putting drive time on his time sheet. Shortly thereafter on the same day, the Plaintiff was contacted by his supervisor, the Defendant Leonel Lujan, and the following exchange occurred via text:

- a. LUJAN: "Why are you charging drive time when a place has been provided for you at the rig?"
- b. PLAINTIFF: "I live an (sic) 2 hours away u will not force me to stay on the rig without paying me for it if u pay me to stay here I will."
- c. LUJAN: "Clean your truck then, I cannot force you to stay at the rig, but you cannot force me to keep you hired. I'll have Chapa pick up your truck."

13. The Defendants terminated Plaintiff's employment at that time.

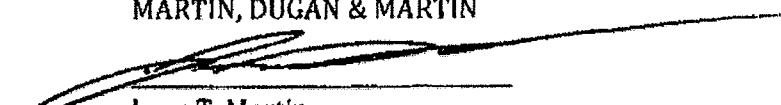
14. The Defendants terminated Plaintiff as a result of his good faith complaint about not being paid to stay at site, and good faith request to be paid if the Defendants were going to force him to stay at the rig.

15. The Plaintiff complained to Defendants' upper level management who further ratified the actions of the Lujan.

16. The Plaintiff suffered job loss, loss of income, and other damages as a result of Defendants' actions.

17. The Defendants' actions constitute an unlawful employment practice and violate the anti-retaliation provisions of the New Mexico Wage And Hour Act's anti-retaliation provisions (N.M.S.A. 1978, §50-4-26.1) and the Fair Labor Standards Act (29 U.S.C.A. §215).
  18. The Defendants' actions breached the implied contract between the Plaintiff and the Defendants with regard to his working conditions and not requiring he stay overnight at the rig site.
  19. The Defendants' actions breached the public policy in New Mexico and the United States prohibiting retaliation against workers for protesting working conditions and exercising rights with regard to payment of wages and working conditions.
  20. The Defendants' actions constitute a prima facie tort.
  21. The Defendants are jointly and severally liable.
  22. The Plaintiff is entitled to an award of punitive damages and all other damages recoverable under the law.
- WHEREFORE, the Plaintiff prays for a Judgment against the Defendants to include:
1. An award of general, actual, consequential, and punitive damages;
  2. An award of costs and attorney's fees;
  3. Prejudgment and post judgment interest; and
  4. Such other and further relief as the Court deems just and proper.

Submitted by:  
MARTIN, DUGAN & MARTIN



Lane T. Martin  
W.T. Martin Jr.  
Mark Horton  
509 W. Pierce St.

P.O. Box 2168  
Carlsbad, NM 88221-2168  
(575) 887-3528  
(575) 887-2136 (fax)  
Attorneys for Plaintiff Walrop

FILED IN MY OFFICE  
DISTRICT COURT CLERK  
2/19/2014 3:25:05 PM  
ERIC ELLIS

STATE OF NEW MEXICO  
COUNTY OF EDDY  
FIFTH JUDICIAL DISTRICT COURT

MLH

MICHAEL WALDROP,  
Plaintiff,

D-503-CV-2014-00159

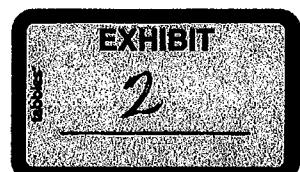
vs.

SCHLUMBERGER TECHNOLOGY  
CORPORATION, a foreign profit  
Corporation, M-I SWACO (a.k.a.  
M-I LLC), a foreign Limited  
Liability Company, and  
LEONEL LUJAN,  
Defendants.

COMPLAINT FOR RETALIATORY DISCHARGE IN VIOLATION OF THE NEW MEXICO WAGE  
AND HOUR ACT AND FAIR LABOR STANDARDS ACT, AND FOR PRIMA FACIE TORT AND  
BREACH OF IMPLIED CONTRACT

COMES NOW, Michael Waldrop, the Plaintiff, by and through his attorneys, the Martin, Dugan and Martin Law Firm, and for his *Complaint For Retaliatory Discharge In Violation Of The New Mexico Wage And Hour Act and the Fair Labor Standards Act, and for Prima Facie Tort and Breach of Implied Contract* states:

1. Plaintiff, Michael Waldrop, is a resident of Roswell, Chaves County, New Mexico.
2. The Defendant, Schlumberger Technology Corporation, is a foreign corporation whose registered agent for process is National Registered Agent's Inc, located at 123 East Marcy, Santa Fe, New Mexico 87501.
3. M-I Swaco is known as M-I, LLC. It is a foreign limited liability company. Schlumberger owns this company and manages it. Its registered agent for process is National Registered Agent's Inc, located at 123 East Marcy, Santa Fe, New Mexico 87501.



4. Leonel Lujan is an employee of Schlumberger/M-I Swaco. He was Plaintiff's supervisor.
5. The Plaintiff and the Defendants all work and do business in Eddy County, New Mexico. The facts giving rise to this Complaint also occurred in Eddy County, New Mexico. Venue is proper in the Fifth Judicial District Court of Eddy County.
6. Plaintiff worked for the Defendant Schlumberger/M-I Swaco at a rig located in an isolated portion South Eddy County. For over two years he had been paid "drive time" for the time it took him to drive from his home to the rig. Likewise, other employees were also paid drive time for the time it took them to drive from their home to the rig.
7. Plaintiff worked approximately twelve (12) hour days. Approximately eight (8) of those hours were spent on site at the rig. The remaining four (4) were spent driving between the rig and his home.
8. The Defendant Schlumberger/M-I Swaco provided Plaintiff with a company truck for his drive.
9. In or around January 2013 the Defendant Schlumberger/M-I Swaco delivered overnight trailers to the rig site. These trailers had sleeping quarters. The Plaintiff was told about the trailers and that he could stay in trailers rather than drive home. Plaintiff was not told he would be paid to stay in the trailers, and believed he would not be compensated for staying overnight at a remote rig site.
10. The Plaintiff elected not to stay overnight in trailers. Between January 2013 and December 9, 2013, he continued to drive between the rig and his home. He also

continued to collect drive time during this period without any objection from his employer or directive not to include the drive time.

11. The Plaintiff's coworkers and employees of Defendant continued to collect drive time and were not staying at the rig site.

12. On December 9, 2013, an employee by the name "Chapa" contacted Plaintiff and requested he stop putting drive time on his time sheet. Shortly thereafter on the same day, the Plaintiff was contacted by his supervisor, the Defendant Leonel Lujan, and the following exchange occurred via text:

- a. LUJAN: "Why are you charging drive time when a place has been provided for you at the rig?"
- b. PLAINTIFF: "I live an (sic) 2 hours away u will not force me to stay on the rig without paying me for it if u pay me to stay here I will."
- c. LUJAN: "Clean your truck then, I cannot force you to stay at the rig, but you cannot force me to keep you hired. I'll have Chapa pick up your truck."

13. The Defendants terminated Plaintiff's employment at that time.

14. The Defendants terminated Plaintiff as a result of his good faith complaint about not being paid to stay at site, and good faith request to be paid if the Defendants were going to force him to stay at the rig.

15. The Plaintiff complained to Defendants' upper level management who further ratified the actions of the Lujan.

16. The Plaintiff suffered job loss, loss of income, and other damages as a result of Defendants' actions.

17. The Defendants' actions constitute an unlawful employment practice and violate the anti-retaliation provisions of the New Mexico Wage And Hour Act's anti-retaliation provisions (N.M.S.A. 1978, §50-4-26.1) and the Fair Labor Standards Act (29 U.S.C.A. §215).

18. The Defendants' actions breached the implied contract between the Plaintiff and the Defendants with regard to his working conditions and not requiring he stay overnight at the rig site.

19. The Defendants' actions breached the public policy in New Mexico and the United States prohibiting retaliation against workers for protesting working conditions and exercising rights with regard to payment of wages and working conditions.

20. The Defendants' actions constitute a prima facie tort.

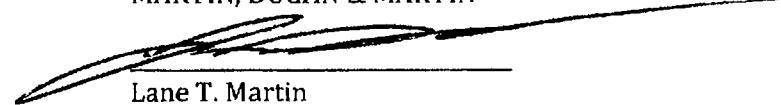
21. The Defendants are jointly and severally liable.

22. The Plaintiff is entitled to an award of punitive damages and all other damages recoverable under the law.

WHEREFORE, the Plaintiff prays for a Judgment against the Defendants to include:

1. An award of general, actual, consequential, and punitive damages;
2. An award of costs and attorney's fees;
3. Prejudgment and post judgment interest; and
4. Such other and further relief as the Court deems just and proper.

Submitted by:  
MARTIN, DUGAN & MARTIN



Lane T. Martin  
W.T. Martin Jr.  
Mark Horton  
509 W. Pierce St.

P.O. Box 2168  
Carlsbad, NM 88221-2168  
(575) 887-3528  
(575) 887-2136 (fax)  
Attorneys for Plaintiff Walrop

**NATIONAL REGISTERED AGENTS, INC**

**SERVICE OF PROCESS SUMMARY TRANSMITTAL FORM**

To: RICHARD HOFFMAN  
SCHLUMBERGER LIMITED  
5599 SAN FELIPE, 16TH FLOOR  
HOUSTON, TX 77056

SOP Transmittal # 524683208

800-592-9023 - Telephone

Entity Served: SCHLUMBERGER TECHNOLOGY CORPORATION (Domestic State: TEXAS)

Enclosed herewith are legal documents received on behalf of the above captioned entity by National Registered Agents, Inc or its Affiliate in the State of NEW MEXICO on this 31 day of March, 2014. The following is a summary of the document(s) received:

1. Title of Action: Michael Waldrop, Pltf. vs. Schlumberger Technology Corporation, etc., et al., Dfts.

2. Document(s) Served: Other, Letter, Summons, Attachment, First Amended Complaint

3. Court of Jurisdiction/Case Number: Eddy County 5th Judicial District Court, NM  
Case # CV2014159

4. Amount Claimed, if any: N/A

5. Method of Service:

Personally served by:  Process Server  Deputy Sheriff  U. S Marshall

Delivered Via:  Certified Mail  Regular Mail  Facsimile

Other (Explain):

6. Date of Receipt: 03/31/2014

7. Appearance/Answer Date: Within 30 days after service

8. Received From: Lane T. Martin 9. Federal Express Airbill # 798410075031

Martin, Dugan & Martin  
509 W. Pierce St  
PO Box 2168  
Carlsbad, NM 88221-2168  
575-887-3528

10. Call Made to: Not required

11. Special Comments:

SOP Papers with Transmittal, via Fed Ex 2 Day.

Image SOP

Email Notification, RICHARD.HOFFMAN@EXCHANGE.SLB.COM

Email Notification, SANDY THOMPSON STHOMPSON9@SLB.COM

Email Notification, DANIEL YATES YATES1@EXCHANGE.SLB.COM

Email Notification, BEVERLY MELCHOR MELCHOR@SUGAR-LAND.SL.SLB.COM

REMARKS : Please note: No previous docket history found.

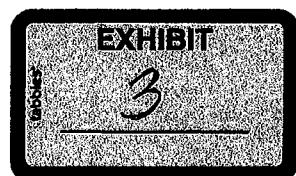
NATIONAL REGISTERED AGENTS, INC

Copies To:

Transmitted by Amy McLaren

The information contained in this Summary Transmittal Form is provided by National Registered Agents, Inc for informational purposes only and should not be considered a legal opinion. It is the responsibility of the parties receiving this form to review the legal documents forwarded and to take appropriate action.

ORIGINAL



STATE OF NEW MEXICO  
COUNTY OF EDDY  
FIFTH JUDICIAL DISTRICT COURT

MICHAEL WALDROP,  
Plaintiff,

vs.

CV-2014-159

SCHLUMBERGER TECHNOLOGY  
CORPORATION, a foreign profit  
Corporation, M-I SWACO (a.k.a.  
M-I LLC), a foreign Limited  
Liability Company, and  
LEONEL LUJAN,  
Defendants.

**SUMMONS**

TO: Schlumberger Technology Corporation  
National Registered Agent's Inc., Registered Agent  
123 East Marcy  
Santa Fe, New Mexico 87501

A lawsuit has been filed against you in the above Court located at 102 North Canal Street, Carlsbad, New Mexico 88220. A copy of the Complaint in the lawsuit is attached. The Court has issued this Summons. You must respond to the Complaint in writing if you wish to contest the allegations and/or the relief requested in the Complaint. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. You must file your written response with the Court. When you file your response, you must immediately provide a true and correct copy to the Martin, Dugan and Martin Law Firm, at 509 West Pierce, P.O. Box 2168, Carlsbad, New Mexico 88221. The Court may enter a judgment against you and grant the relief requested in the Complaint if you do not respond in writing to the Complaint and file your response with the Court. If you need an interpreter, you must ask for one in writing. You may also wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at [www.nmbar.org](http://www.nmbar.org); 1-800-876-6657; or 1-505-797-6066.

Dated at Carlsbad, New Mexico, this 25th day of March, 2014.

ERIC ELLIS, CLERK

By Michael Waltrip

Deputy



STATE OF NEW MEXICO

)

) ss.

COUNTY OF EDDY

)

**Return for Completion by Person Making Service:**

I, \_\_\_\_\_, being duly sworn, on oath, say that I am over the age of 18 years and not a party to this lawsuit, and that I served the within Summons in said County on the \_\_\_\_\_ day of \_\_\_\_\_, 2014, by delivering a copy thereof, with copy of Complaint attached, in the following manner:

To Defendant \_\_\_\_\_ (used when Defendant receives copy of Summons, is read Summons or Complaint or refuses to receive Summons or hear reading.)

To \_\_\_\_\_, a person 15 years of age and residing at the usual place of abode of Defendant who at the time of such service was absent therefrom.

By posting a copy of the Summons and Complaint in the most public part of the premises of Defendant \_\_\_\_\_ (used if no person found at dwelling house or usual place of abode).

To \_\_\_\_\_, an agent authorized to receive service of process for Defendant \_\_\_\_\_.

To \_\_\_\_\_, (parent) (guardian) of Defendant \_\_\_\_\_ (used when Defendant is a minor or an incompetent person).

To \_\_\_\_\_, \_\_\_\_\_ Name of Person \_\_\_\_\_ Title of person authorized to receive service (used when Defendant is a corporation or association subject to a suit under a common name, a land grant board of trustees, the State of New Mexico or any political subdivision.)

By \_\_\_\_\_  
Signature of Private Citizen Making Service

**Statement of Services**

TRAVEL	SERVICES	TOTAL
\$	\$	\$

**SUBSCRIBED, SWORN and ACKNOWLEDGED before me this \_\_\_\_\_ day of \_\_\_\_\_, 2014, by \_\_\_\_\_.**

\_\_\_\_\_  
Notary Public

My Commission Expires:

15564  
5/25/14

STATE OF NEW MEXICO  
COUNTY OF EDDY  
FIFTH JUDICIAL DISTRICT COURT

MICHAEL WALDROP,  
Plaintiff,

vs.

CV-2014-159

SCHLUMBERGER TECHNOLOGY  
CORPORATION, a foreign profit  
Corporation, M-I SWACO (a.k.a.  
M-I LLC), a foreign Limited  
Liability Company, and  
LEONEL LUJAN,  
Defendants.

**SUMMONS**

TO: M-I SWACO (a.k.a M-I LLC)  
National Registered Agent's Inc., Registered Agent  
123 East Marcy  
Santa Fe, New Mexico 87501

A lawsuit has been filed against you in the above Court located at 102 North Canal Street, Carlsbad, New Mexico 88220. A copy of the Complaint in the lawsuit is attached. The Court has issued this Summons. You must respond to the Complaint in writing if you wish to contest the allegations and/or the relief requested in the Complaint. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. You must file your written response with the Court. When you file your response, you must immediately provide a true and correct copy to the Martin, Dugan and Martin Law Firm, at 509 West Pierce, P.O. Box 2168, Carlsbad, New Mexico 88221. The Court may enter a judgment against you and grant the relief requested in the Complaint if you do not respond in writing to the Complaint and file your response with the Court. If you need an interpreter, you must ask for one in writing. You may also wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at [www.nmbar.org](http://www.nmbar.org); 1-800-876-6657; or 1-505-797-6066.

Dated at Carlsbad, New Mexico, this 25th day of March, 2014.

ERIC ELLIS, CLERK  
By Michelle Tew

Deputy



STATE OF NEW MEXICO )

) ss.

COUNTY OF EDDY )

**Return for Completion by Person Making Service:**

I, \_\_\_\_\_, being duly sworn, on oath, say that I am over the age of 18 years and not a party to this lawsuit, and that I served the within Summons in said County on the \_\_\_\_\_ day of \_\_\_\_\_, 2014, by delivering a copy thereof, with copy of Complaint attached, in the following manner:

To Defendant \_\_\_\_\_ (used when Defendant receives copy of Summons, is read Summons or Complaint or refuses to receive Summons or hear reading.)

To \_\_\_\_\_, a person 15 years of age and residing at the usual place of abode of Defendant \_\_\_\_\_ who at the time of such service was absent therefrom.

By posting a copy of the Summons and Complaint in the most public part of the premises of Defendant \_\_\_\_\_ (used if no person found at dwelling house or usual place of abode).

To \_\_\_\_\_, an agent authorized to receive service of process for Defendant \_\_\_\_\_.

To \_\_\_\_\_, (parent) (guardian) of Defendant \_\_\_\_\_ (used when Defendant is a minor or an incompetent person).

To \_\_\_\_\_, \_\_\_\_\_ Name of Person \_\_\_\_\_ Title of person authorized to receive service (used when Defendant is a corporation or association subject to a suit under a common name, a land grant board of trustees, the State of New Mexico or any political subdivision.)

By \_\_\_\_\_  
Signature of Private Citizen Making Service

**Statement of Services**

TRAVEL	SERVICES	TOTAL
\$	\$	\$

**SUBSCRIBED, SWORN and ACKNOWLEDGED before me this \_\_\_\_\_ day of \_\_\_\_\_, 2014, by \_\_\_\_\_.**

\_\_\_\_\_  
Notary Public

My Commission Expires:

STATE OF NEW MEXICO  
COUNTY OF EDDY  
FIFTH JUDICIAL DISTRICT COURT

MICHAEL WALDROP,  
Plaintiff,

vs.

CV-2014-159

SCHLUMBERGER TECHNOLOGY  
CORPORATION, a foreign profit  
Corporation, M-I SWACO (a.k.a.  
M-I LLC), a foreign Limited  
Liability Company, and  
LEONEL LUJAN,  
Defendants.

*Issued  
3/25/14*

**SUMMONS**

TO: Schlumberger Technology Corporation  
National Registered Agent's Inc., Registered Agent  
123 East Marcy  
Santa Fe, New Mexico 87501

A lawsuit has been filed against you in the above Court located at 102 North Canal Street, Carlsbad, New Mexico 88220. A copy of the Complaint in the lawsuit is attached. The Court has issued this Summons. You must respond to the Complaint in writing if you wish to contest the allegations and/or the relief requested in the Complaint. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. You must file your written response with the Court. When you file your response, you must immediately provide a true and correct copy to the Martin, Dugan and Martin Law Firm, at 509 West Pierce, P.O. Box 2168, Carlsbad, New Mexico 88221. The Court may enter a judgment against you and grant the relief requested in the Complaint if you do not respond in writing to the Complaint and file your response with the Court. If you need an interpreter, you must ask for one in writing. You may also wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at [www.nmbar.org](http://www.nmbar.org); 1-800-876-6657; or 1-505-797-6066.

Dated at Carlsbad, New Mexico, this 25th day of March, 2014.

ERIC ELLIS, CLERK

By Michael L. Trew

Deputy



STATE OF NEW MEXICO

) ss.  
)

COUNTY OF Santa Fe

## Return for Completion by Person Making Service:

I, Ashley Switzer, being duly sworn, on oath, say that I am over the age of 18 years and not a party to this lawsuit, and that I served the within Summons in said County on the 31 day of March, 2014, by delivering a copy thereof, with copy of Complaint attached, in the following manner:

To Defendant \_\_\_\_\_ (used when Defendant receives copy of Summons, is read Summons or Complaint or refuses to receive Summons or hear reading.)

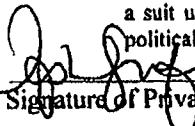
To \_\_\_\_\_, a person 15 years of age and residing at the usual place of abode of Defendant who at the time of such service was absent therefrom.

By posting a copy of the Summons and Complaint in the most public part of the premises of Defendant \_\_\_\_\_ (used if no person found at dwelling house or usual place of abode).

To M-1 SWACO F.K.A M-1 LLC, an agent authorized to receive service of process for Defendant \_\_\_\_\_.

To \_\_\_\_\_, (parent) (guardian) of Defendant \_\_\_\_\_ (used when Defendant is a minor or an incompetent person).

To \_\_\_\_\_, \_\_\_\_\_ Name of Person \_\_\_\_\_ Title of person authorized to receive service (used when Defendant is a corporation or association subject to a suit under a common name, a land grant board of trustees, the State of New Mexico or any political subdivision.)

By   
Signature of Private Citizen Making Service

## Statement of Services

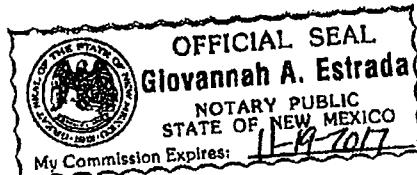
TRAVEL	SERVICES	TOTAL
\$	\$	\$

SUBSCRIBED, SWORN and ACKNOWLEDGED before me this 16 day of April, 2014, by Ashley Switzer

Giovannah A. Estrada  
Notary Public

My Commission Expires:

11-19-2017



SENDER: COMPLETE THIS SECTION			
COMPLETE THIS SECTION ON DELIVERY			
<p><b>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</b></p> <p><b>■ Print your name and address on the reverse so that we can return the card to you.</b></p> <p><b>■ Attach this card to the back of the mailpiece, or on the front if space permits.</b></p>			
<p>1. Article Addressed to:</p> <p><i>M-1 SWACO aka M-1 LLC National Registered Agents Inc. 123 East Marcy Santa Fe NM 87501</i></p>			
<p>C. Signature <i>[Signature]</i></p> <p>D. Received by (Printed Name) <i>[Signature]</i></p> <p>E. Received by (Printed Name) <i>[Signature]</i></p> <p>F. Signature <i>[Signature]</i></p> <p>G. Date of Delivery</p>			
<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p>			
<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>			
<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>			
<p>2. Article Number <b>7008 1630 0003 0470 0416</b></p> <p>(Transfer from service label)</p>			

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**Customer Service** ›  
Have questions? We're here to help.

**USPS Tracking™**

Tracking Number: 70081830000304700416

**Product & Tracking Information****Available Actions**

Postal Product:	Features:	Actions	
	Certified Mail™	<a href="#">USPS Text Tracking™</a>	

DATE & TIME	STATUS OF ITEM	LOCATION	ACTIONS
March 31, 2014 , 1:54 pm	Delivered	SANTA FE, NM 87501	<a href="#">Email Updates</a>
March 31, 2014 , 10:03 am	Notice Left (No Authorized Recipient Available)	SANTA FE, NM 87501	
March 29, 2014 , 9:52 am	Notice Left (Business Closed)	SANTA FE, NM 87501	
March 29, 2014 , 12:35 am	Processed at USPS Origin Sort Facility	ALBUQUERQUE, NM 87101	
March 28, 2014	Depart USPS Sort Facility	ALBUQUERQUE, NM 87101	
March 28, 2014 , 5:08 pm	Processed at USPS Origin Sort Facility	ALBUQUERQUE, NM 87101	
March 27, 2014	Depart USPS Sort Facility	LUBBOCK, TX 79402	
March 27, 2014 , 10:54 pm	Processed at USPS Origin Sort Facility	LUBBOCK, TX 79402	
March 27, 2014 , 4:47 pm	Dispatched to Sort Facility	CARLSBAD, NM 88220	
March 27, 2014 , 4:16 pm	Acceptance	CARLSBAD, NM 88220	

**Track Another Package**

What's your tracking (or receipt) number?

**Track It**

**STATE OF NEW MEXICO  
COUNTY OF EDDY  
FIFTH JUDICIAL DISTRICT COURT**

**MICHAEL WALDROP,  
Plaintiff,**

**vs.**

**D-503-CV-2014-00159**

**SCHLUMBERGER TECHNOLOGY  
CORPORATION, a foreign profit  
Corporation, M-I SWACO (a.k.a  
M-I LLC) a foreign Limited  
Liability Company, and  
LEONEL LUJAN,  
Defendants.**

**NOTICE OF FILING OF REMOVAL**

PLEASE TAKE NOTICE, that on the 28<sup>th</sup> day of April 2014, Defendants Schlumberger Technology Corporation and M-I L.L.C., d/b/a M-I Swaco, filed a Notice of Removal, of the above-captioned action to the United States District Court for the District of New Mexico.

Respectfully submitted,

Rodey, Dickason, Sloan, Akin & Robb, P.A.

By: Electronically Filed /s/ Jeffrey L. Lowry

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*Attorney for Defendants*



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 28<sup>th</sup> day of April, 2014, I filed the foregoing electronically, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

lanemartinlaw@yahoo.com

RODEY, DICKASON, SLOAN, AKIN & ROBB, P.A.

By /s/ Electronically Filed, Jeffrey L. Lowry, Attorney At Law  
Jeffrey L. Lowry